

**Commonwealth of Kentucky
Environmental and Public Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382**

**AIR QUALITY PERMIT
Issued under 401 KAR 52:040**

Permittee Name: NHK- Associated Spring Suspension
Components, Inc. (NASCO)
Mailing Address: 3251 Nashville Road, Bowling Green, KY 42101

Source Name: NHK- Associated Spring Suspension
Components, Inc. (NASCO)
Mailing Address: 3251 Nashville Road
Bowling Green, KY 42101

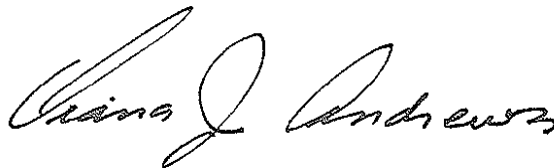
Source Location: Same

Permit ID: S-08-059
Agency Interest #: 4130
Activity ID: APE20050002
Review Type: Minor Source, Operating
Source ID: 21-227-00080

Regional Office: Bowling Green Regional Office
1508 Westen Avenue
Bowling Green, KY 42104
(270) 746-7475

County: Warren

Application
Complete Date: October 5, 2007
Issuance Date: May 30, 2008
Revision Date:
Expiration Date: May 30, 2018



**John S. Lyons, Director
Division for Air Quality**

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

EP 07 (07) Line #1 Shot Peening Machine

Description: Maximum Rated Capacity: 3.8 tons/hr steel springs; 26.5 lb/hr steel shot
Particulate Control: Fabric Filter Baghouse (Integral to the Shot Capture System Operation and Design)
Control Efficiency: 99.9%
Date Installed: June 1987

EP 16 (16) Line #2 Quenching Machine

Description: Maximum Rated Capacity: 1.32 gallons quench oil/hour; 3.8 tons/hr steel springs
Particulate Control: Mist Eliminator
Control Efficiency: 99%
Date Installed: January 1990

EP 18 (18) Line #2 Shot Peening Machine

Description: Maximum Rated Capacity: 3.8 tons/hr steel springs; 26.5 lb/hr steel shot
Particulate Control: Fabric Filter Baghouse (Integral to the Shot Capture System Operation and Design)
Control Efficiency: 99.9%
Date Installed: January 1990

EP 32 (32) Line #3 Quenching Machine

Description: Maximum Rated Capacity: 1.32 gallons quench oil/hour; 4.2 tons/hr steel springs
Particulate Control: Mist Eliminator
Control Efficiency: 99%
Date Installed: August 1995

EP 34 (36) Line #3 Shot Peening Machine

Description: Maximum Rated Capacity: 4.2 tons/hr steel springs; 112 lb/hr steel shot
Particulate Control: Fabric Filter Baghouse (Integral to the Shot Capture System Operation and Design)
Control Efficiency: 99.9%
Date Installed: December 2003

EP 43 (43) Cold Draw - Shot Peening Machine

Description: Maximum Rated Capacity: 4 tons/hr steel bar; 42 lb/hr steel shot
Particulate Control: Fabric Filter Baghouse (Integral to the Shot Capture System Operation and Design)
Control Efficiency: 99.5%
Date Installed: March 1997

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**EP 44 (44) Turning Machine**

Description: Maximum Rated Capacity: 2 tons/hr steel wire
Particulate Control: Filter Unit
Control Efficiency: 99.9%
Date Installed: March 1997

EP 51 (51) Line # 4 Shot Peening Machine

Description: Maximum Rated Capacity: 7.9 tons/hr steel springs; 54 lb/hr steel shot
Particulate Control: Fabric Filter Baghouse (Integral to the Shot Capture System Operation and Design)
Control Efficiency: 99.9%
Date Installed: July 2001

EP 56 (56) Line # 5 Shot Peening Machine

Description: Maximum Rated Capacity: 8.8 tons/hr steel springs; 54 lb/hr steel shot
Particulate Control: Fabric Filter Baghouse Integral to the Shot Capture System Operation and Design
Control Efficiency: 99.99%
Date Installed: July 2001

EP 60 (60) Cold Draw- Shot Peening

Description: Maximum Rated Capacity: 10 tons/hr steel bar; 50 lb/hr steel shot
Particulate Control: Fabric Filter Baghouse (Integral to the Shot Capture System Operation and Design)
Control Efficiency: 99.5%
Date Installed: October 2006

APPLICABLE REGULATIONS:

401 KAR 59:010, *New Process Operations*, applies to each of the affected facilities listed above constructed on or after July 2, 1975, which is associated with a control device or stack and not subject to another emission standard with respect to particulates.

1. Operating Limitations:

The dust collectors and mist eliminators associated with the above affected facilities shall be operated at all times of equipment operation and in a manner which ensures compliance with the emission limitations in Section B.2 below.

2. Emission Limitations:

- a. Pursuant to 401 KAR 59:010, Section 3(2) and Appendix A, emissions of particulate matter from the control device or stack for each emission point specified above shall not exceed the lbs/hr limit as determined by the following formula:

For process rates up to 60,000 lbs/hr: $E = 3.59 P^{0.62}$

For the equation E = rate of emission in lb/hr and P = process weight rate in tons/hour

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

For a process rate weight of 1,000 lbs/hr or less the particulate matter emission limit is 2.34 lbs/hr.

- b. Pursuant to 401 KAR 59:010, Section 3(1), visible emissions from the control device or stack for each emission point specified above shall not equal or exceed 20% opacity.

Compliance Demonstration Method:

- a. Compliance with the hourly emission limit shall be determined as follows:

Hourly Emission Rate = [Monthly processing rate x EF* / (Hours of operation per month)] x (1 – control efficiency)

*EF = particulate emission factor (lb/ton process weight, based on the most recent stack test, AP-42, material balance or other factor approved by the Division)

- b. In determining compliance with the opacity standards see **4. Specific Monitoring Requirements** and **5. Specific Recordkeeping Requirements**.

3. Testing Requirements:

Testing shall be conducted at such times as may be required by the cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 4.

4. Monitoring Requirements:

- a. A qualitative visual observation of the opacity of emissions shall be performed from each emission point stack on a monthly basis and a log of the observations maintained. If visible emissions from a stack is seen (not including condensed water vapor within the plume), then the opacity shall be determined by Reference Method 9. If emissions are in excess of the applicable opacity limit, then an inspection shall be initiated of control equipment for all necessary repairs.
- b. Preventive maintenance and/or inspection shall be performed at least once per month for the particulate control devices, in accordance with the manufacturers' recommendations.
- c. See **Section C, General Condition 6.a.**

5. Recordkeeping Requirements:

- a. The permittee shall maintain records in accordance with **4.a. Specific Monitoring Requirements**.
- b. The permittee shall maintain records of preventive maintenance and inspection of the control devices in accordance with **4.b. Specific Monitoring Requirements**.
- c. The permittee shall record the occurrence, duration, cause and any corrective action taken for each incident when an emission point specified in this section is in operation but the particulate control device is not.
- d. See **Section C, General Conditions 2.a., 2.b. and 6.a.**

6. Reporting Requirements:

See **Section C, General Conditions 3.a., 3.b., 3.c., and 6.b.**

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Natural Gas Usage:

EP #	Description	Construction Date	Capacity (MMBtu/hr)
EP 1 (1)	Line #1 End Heating Furnace	June, 1987	0.674
EP 2 (2)	Line #1 Tempering Furnace	June, 1987	7.6429
EP 5 (5/6)	Line #1 Tempering Furnace	June, 1987	5.6349
EP 9 (10)	Line #1 Boiler	June, 1987	0.8085
EP 10 (11/12)	Line #1 Dry-off Oven, Hot Water Tank	June, 1987	0.7937
EP 12 (14)	Line #1 Powder Coating Oven	June, 1987	1.9841
EP 14 (8)	Line #1 Paint Removal Device for Hangers	June, 1987	1.9841
EP 15 (15)	Line #2 Coil Spring Heating Furnace	1990	7
EP 17 (17)	Line #2 Tempering Furnace	1990	5.9
EP 21 (21)	Line #2 Boiler	1990	5.5
EP 22 (22)	Line #2 Dry-off Oven	1990	0.8
EP 24 (24)	Line #2 Powder Coating Bake Oven	1990	2.5
EP 28 (28/29)	Heating Furnace	1991	0.3968
EP 30 (30)	Paint Hanger Cleaning Device	1992	0.515
EP 31 (31)	Line #3 Hardening Furnace	August, 1995	5.35
EP 33 (33-35)	Line #3 Three (3) Tempering Furnaces	August, 1995	6
EP 35 (37)	Line #3 Indirect Heat Exchanger	August, 1995	3.25
EP 46 (46)	Line #4 Paint Hanger Burner	2001	0.515
EP 48 (48/49/50)	Line #4 Three (3) Tempering Furnaces	2001	11
EP 56 (Line #4)	Line #4 Boiler	2001	3.5
EP 45 (45)	Batch Tempering Line	1999	0.5
EP 57 (-)	Line #5 Hook Burn off Oven	2005	2
EP 58 (-)	Line #5 Tempering Furnace	2005	11

APPLICABLE REGULATIONS:

401 KAR 59:015, *New Indirect Heat Exchangers*, applicable to affected facilities with a capacity of 250 million Btu/hr heat input or less and greater than one (1) million Btu/hr, and commenced after April 9, 1972, limits particulate and sulfur dioxide emissions. Applies to EPs 21 (21), 35 (37), and 56 (56). Except for EP 09 (10) which is below the rule applicability threshold, the remaining emission points listed in this section are direct fired units and not subject to this rule.

1. Operating Limitations:

None

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

2. Emission Limitations:

For EP 21 (21), 35 (37), and 56 (56):

- a. Pursuant to 401 KAR 59:015, Section 4(2), no person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility which is equal to or greater than twenty (20) percent opacity.
- b. Pursuant to 401 KAR 59:015, Section 4(1)(a) emissions of particulate matter from the combustion of natural gas fuel shall not exceed 0.56 lb/mmBtu actual heat input.
- c. Pursuant to 401 KAR 59:015 Section 5(c), emissions of sulfur dioxide from the combustion of natural gas fuel shall not exceed 2.7 lb/mmBtu actual heat input.

Compliance Demonstration Method:

Compliance with the particulate matter, sulfur dioxide and opacity standards is demonstrated while burning natural gas.

3. Testing Requirements:

None

4. Monitoring Requirements:

None

5. Recordkeeping Requirements:

None

6. Reporting Requirements:

None

SECTION C - GENERAL CONDITIONS

1. Administrative Requirements

- a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
- b. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15]
- c. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-11 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- d. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition [Section 1a-4, 5, of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- e. This permit does not convey property rights or exclusive privileges [Section 1a-8 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- f. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:040 Section 11(3)].
- g. This permit shall be subject to suspension at any time the permittee fails to pay all fees within 90 days after notification as specified in 401 KAR 50:038, Air emissions fee. The permittee shall submit an annual emissions certification pursuant to 401 KAR 52:040, Section 20.
- h. All previously issued permits to this source at this location are hereby null and void.

SECTION C - GENERAL CONDITIONS (CONTINUED)**2. Recordkeeping Requirements**

- a. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:040 Section 3(1)(f) and Section 1b-IV-2 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

3. Reporting Requirements

- a. (1) In accordance with the provisions of 401 KAR 50:055, Section 1, the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
- (2) The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition a.(1) above), the probable cause of the deviation, and corrective or preventive measures taken; to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report [Section 1b-V-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall furnish information requested by the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the permit [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- c. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation. The summary reports

SECTION C - GENERAL CONDITIONS (CONTINUED)

are due January 30th and July 30th of each year. All deviations from permit requirements shall be clearly identified in the reports. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

4. Inspections

In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times. Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency:

- a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation.
- b. To access and copy any records required by the permit.
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit.
- d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

5. Emergencies/Enforcement Provisions

- a. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
 - (1) An emergency occurred and the permittee can identify the cause of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - (4) The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- c. Emergency provisions listed in General Condition 5.b are in addition to any emergency or upset provision contained in an applicable requirement [401 KAR 52:040, Section 22(1)].
- d. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 52:040, Section 22(2)].

SECTION C - GENERAL CONDITIONS (CONTINUED)**6. Compliance**

- a. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
- (1) Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
 - (2) All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and nonroutine maintenance performed on each control device. Daily observations are required during daylight hours of all operations, control equipment and any visible emissions to determine whether conditions appear to be either normal or abnormal. If the operations, controls and/or emissions appear to be abnormal, the permittee must then comply with the requirements of Section C – General Conditions, 3.a.(2), of this permit.
 - (3) A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division [401 KAR 50:055, Section 2].
- b. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:
- (1) Identification of the term or condition;
 - (2) Compliance status of each term or condition of the permit;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The method used for determining the compliance status for the source, currently and over the reporting period, and
 - (5) For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
 - (6) The certification shall be postmarked by January 30th of each year. Annual compliance certifications shall be mailed to the following addresses:
- | | |
|-------------------------------|--------------------------|
| Division for Air Quality | Division for Air Quality |
| Bowling Green Regional Office | Central Files |
| 1508 Westen Avenue | 803 Schenkel Lane |
| Bowling Green, KY 42104 | Frankfort, KY 40601-1403 |

SECTION C - GENERAL CONDITIONS (CONTINUED)

- c. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
 - (1) Applicable requirements that are included and specifically identified in this permit; or
 - (2) Non-applicable requirements expressly identified in this permit [401 KAR 52:040, Section 11].

SECTION D - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to an opacity standard shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspection, evaluation, and any corrective action shall be recorded in a log.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. EP 8 (9) Line #1 Phosphate Tank Date of Construction: June, 1987	401 KAR 59:010
2. EP 11 (13) Line #1 Dry Powder Coat Booth Rated at 37.5 lb/hour powder coatings Date of Construction: June, 1987	401 KAR 59:010
3. EP 13 (-) Line #1 Nine (9) Oil Storage Tanks Capacity: 66 gal to 4,868 gal, plus one (1) at 10,568 gal Date of Construction: 1987	none
4. EP 20 (20) Line #2 Surface Preparation Tanks Date of Construction: 1990	401 KAR 59:010
5. EP 23 (23) Line #2 Powder Coat Booth Rated at 37.5 lb/hour powder coatings Date of Construction: 1990	401 KAR 59:010
6. EP 26 (26) Line #2 Eight (8) Oil Storage Tanks Capacity: 66 gal to 4,868 gal Date of Construction: 1990	none
7. EP 36 (38) Line # 3 Phosphate Bath 4500 gallon Water & Zinc Phosphate Bath; 4.02 lb/hr acid zinc phosphate Date of Construction: July, 1995	401 KAR 59:010
8. EP 38 (41) Line #3 Powder Coat Booth Rated at 37.5 lb/hour powder coatings Date of Construction: August, 1995	401 KAR 59:010
9. EP 52 (52) Line #4 Powder Coat Booth Rated at 37.5 lb/hour powder coatings Date of Construction: 1990	401 KAR 59:010

SECTION D - INSIGNIFICANT ACTIVITIES (CONTINUED)

<u>Description</u>	<u>Generally Applicable Regulation</u>
10. EP 54 (54) Line #4 Pretreatment Degreaser Capacity: 800 gallons Alkaline Degreaser Date of Construction: 2001	none
11. EP 55 (55) Line #4 Pretreatment Phosphate Capacity: 2340 gallons Water & Zinc Phosphate Bath Date of Construction: 2001	401 KAR 59:010
12. EP 61 (-) Line #5 Powder Coat Booth Rated at 37.5 lb/hour powder coatings Date of Construction: 2005	401 KAR 59:010
13. EP - (-) Line #5 Electric Induction Furnace Date of Construction: 2005	401 KAR 59:010
14. EP - (54) Line #5 Pretreatment Degreaser Alkaline Degreaser Date of Construction: 2005	none
15. EP - (-) Line #5 Pretreatment Phosphate Water & Zinc Phosphate Bath Date of Construction: 2005	401 KAR 59:010
16. EP - (-) Line #5 Quenching with Mist Eliminator Exhausted inside building, no external exhaust Date of Construction: 2005	401 KAR 59:010